

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

_____)	
RONNIE JONES, ET AL.,)	
)	
Plaintiffs,)	
)	
vs.)	NO. 05-11832-GAO
)	
CITY OF BOSTON, ET AL.,)	
)	
Defendants.)	
_____)	

DEFENDANTS' MOTION FOR LEAVE TO FILE EXHIBITS UNDER SEAL

The Defendants respectfully move this Court for leave to file documents in support of Defendants' Motion for Summary Judgment under seal, including:

- (i) Expert Report of J. Michael Walsh, Ph.D., dated March 16, 2009;
- (ii) Expert Report of Douglas E. Rollins, M.D., Ph.D., May 19, 2011;
- (iii) Expert Report of Leo Kadehjian, dated March 13, 2009;
- (iv) Reply of J. Michael Walsh to Rebuttal Report of Leo J. Kadehjian, dated May 7, 2009;
- (v) Expert Report of Sharon Kelly, dated March 16, 2009
- (vi) Reply Expert Report of Sharon Kelly, dated May 5, 2009
- (vii) Rebuttal Expert Report of Sharon Kelly, dated April 14, 2008;
- (viii) Deposition of Roberta Mullan, dated January 5, 2007; and
- (ix) Deposition of Sharon Kelly, dated June 24, 2009.

(collectively, the "Confidential Exhibits"). The Confidential Exhibits have been designated as

"Highly Confidential" during discovery of this matter, and therefore should not be available for public viewing. Moreover, these documents have been previously filed under seal, both with this Court and with the First Circuit. Accordingly, in consistent fashion with prior orders and in compliance with this Court's January 2007 Protective Order, the Defendants request that these Confidential Exhibits be filed under seal.

WHEREFORE, Defendants respectfully requests that the Court grant leave to file under seal the Confidential Exhibits.

Respectfully submitted,
Defendants City of Boston, Boston Police
Department and Edward Davis,
By their attorney,

/s/ Helen G. Litsas

Helen G. Litsas (BBO #644848)

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CERTIFICATE OF SERVICE

I hereby certify that on December 11, 2014 a true copy of this Motion to Seal was served through the Court's electronic filing system upon all counsel of record.

/s/ Helen G. Litsas

